

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

X CORP., §
§
Plaintiff, §
§
v. § No. 7:24-cv-00114-B
§
WORLD FEDERATION OF ADVERTISERS; §
MARS, INCORPORATED; §
CVS HEALTH CORPORATION; §
ØRSTED A/S; §
TWITCH INTERACTIVE, INC. §
NESTLÉ S.A.; NESTLE USA, INC.; §
ABBOTT LABORATORIES; §
COLGATE-PALMOLIVE COMPANY; §
LEGO A/S; LEGO BRAND RETAIL, INC.; §
PINTEREST, INC.; §
TYSON FOODS, INC.; §
SHELL PLC; SHELL USA, INC.; AND §
SHELL BRANDS INTERNATIONAL AG, §
§
Defendants. §

**DEFENDANT LEGO A/S'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Federal Rule of Civil Procedure 12(b)(2), Defendant LEGO A/S, by its attorneys, respectfully moves this Court to dismiss Plaintiff X Corp.'s Complaint for lack of personal jurisdiction over LEGO A/S.¹

As set forth in the accompanying Brief in Support and Appendix, this Court lacks personal jurisdiction over LEGO A/S, under both the Texas long-arm statute and Section 12 of

¹ Plaintiff's claims cannot proceed in this Court against Lego A/S because it is not subject to personal jurisdiction in Texas. But, even if this Court finds otherwise, this suit cannot proceed because Plaintiff fails to state a claim, as demonstrated in the concurrently-filed Motion to Dismiss for Failure to State a Claim, which Lego A/S joins subject to and without waiving its jurisdictional objections.

the Clayton Act, 15 U.S.C. § 22. LEGO A/S is a Danish corporation with no meaningful ties to Texas or the United States and has undertaken no actions connected to X Corp.'s claims in Texas or the United States. Because X Corp.'s Complaint is devoid of any plausible allegations establishing that LEGO A/S has the necessary minimum contacts required to authorize personal jurisdiction, there is no legal basis for this Court to exercise personal jurisdiction over LEGO A/S. For the reasons set forth above and more fully in the accompanying Brief in Support and Appendix, LEGO A/S respectfully requests that this Court dismiss LEGO A/S from this lawsuit.

Dated: May 14, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned Counsel hereby certifies that on this 14th day of May 2025, notice of the foregoing pleading was provided via the CM/ECF system to the counsel of record.

/s/ Minoo Blaesche

Minoo Blaesche

Attorney for LEGO A/S